American Automobile Manufacturers Association

CHRYSLER CORPORATION | Ford | General Motors

ANDREW H. CARD, Jr.
President and Chief Executive Officer

July 25, 1997

Mr. William F. Caton
Secretary, Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

SUBJECT: Intelligent Transporation Society of America Petition for Dedicated Short Range Communications Frequency Allocation (RM-9096)

The American Automobile Manufacturers Association (AAMA), whose members are Chrysler Corporation, Ford Motor Company, and General Motors Corporation, submits these comments in support of the Intelligent Transportation Society of America's petition for rule making (Public Notice DA 97-1106) requesting that 75 MHz of spectrum in the 5.850-5.925 GHz band be allocated for co-primary use by Intelligent Transportation Systems (ITS) that require dedicated short range communications (DSRC). Such systems require short-range, wireless communication links between highway vehicles and equipment.

AAMA believes that short range communications are necessary to realizing safety, mobility, productivity, and environmental goals sought after under the banner of ITS. It should also be noted that the need for DSRC applies not only to the vehicle-highway system, but also to the intermodal aspects of ITS. Most ITS technologies require on-vehicle equipment that must be purchased by consumers with limited resources. If these technologies are to acheive widespread application (which is necessary to realizing ITS goals) products must be affordable and cost-effective in the eyes of these consumers. ITS America's request to set aside spectrum in the 5.8 GHz band is a significant step toward global harmonization in short range ITS communications, which, in turn, significantly lowers the cost f the technology. Europe and Japan are very close to having a harmonized frequency allocation in the same band that ITS-America has petitioned, as well as communication protocols for ITS DSRC applications.

While current applications utilizing short range communication between vehicles and the roadside, such as commercial vehicle clearances and toll collection, can exist without this 5.8 GHz band allocation, the bands where these applications operate today are crowded and have no possibility of supporting the plethora of ITS safety, security, and information systems that have been proposed for potential future deployment. Setting aside the 5.8 GHz band as a worldwide ITS band will allow an orderly deployment of compatible international protocols and standards. This will facilitate both high volume

HEADQUARTERS
1401 H Street, N.W. Suite 900, Washington, D.C. 20005
202•326•5500 FAX 202•326•5567

DETROIT OFFICE
7430 Second Avenue, Suite 300, Detroit, MI 48202
313•872•4311 FAX 313•872•5400

uses, that will drive down the cost of the communication hardware, as well as low-volume, safety uses that would not be possible without the high-volume component.

However, AAMA realizes that an allocation of frequency does not solidify the manner in which frequency will be used. Therefore, the AAMA urges the FCC to exercise caution in its future rulemakings regarding items such as availability, licensing, commercialization, interference and channelization so as not to allow the details of the band use to unduly favor commercialization or to prohibit, or even unreasonably inhibit, the achievement of national ITS goals -- especially in the area of safety.

In conclusion, AAMA urges the Federal Communications Commission to grant the ITS America petition, and then to expeditiously proceed with establishing the rules for use of the spectrum. Please call Barbara Wendling at (313) 871-6337, or me at (313) 871-6334, if you have any questions regarding these comments.

Sincerely,

Vann H. Wilber
Director
Vehicle Safety & International Department